United States Environmental Protection Agency
Region 1 - EPA New England
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Subject: Longway Farm – Inspection Report

From: Lisa Thuot (OEME)

Reviewed by: Andrew Spejewski

To: File

I. Facility Information

A. Facility #1 Name: Longway Farm
B. Facility #1 Location: 9 Janes Road
Swanton, VT 05488

C. Facility #2 Name: Brodeur Farm
D. Facility #2 Location: 123 Comstock Road
Swanton, VT 05488

E. Farm/Facilities Contacts: Richard ("Dickie") Longway, Owner
(802) 524-5234
Travis Longway, Son of the Owner
Adam Longway, Son of the Owner
Tom Eaton, Agronomy Consultant
3715 Hinesburg Rd., Richmond, VT 05477
(802) 434-3847

F. NPDES ID Number: None

II. Background Information

A. Dates and times of Inspection:
Arrive at Facilities: June 23, 2016 @ 1350
Exit Facilities: June 23, 2016 @ 1700

B. Weather Conditions: Sunny, 70°F. No rain for several days prior to inspection.

C. US EPA Representative(s): Lisa Thuot, Compliance Inspector (OEME)

D. State Representative(s): None

E. Federally Enforceable Requirements Covered During Inspection: 40 CFR §122.23

III. Type and Purpose of Inspection

The purpose of the inspection was to assess applicability of the Concentrated Animal Feeding Operation requirements under the Clean Water Act at 40 C.F.R. Part 122.23. The inspection was requested by the EPA Office of Technical Enforcement.

IV. Inspection Information

Entry Procedures:
The inspection was announced on June 16, 2016 by telephone voicemail message to the owner, Richard ("Dickie") Longway. Upon arrival, I presented my inspector credentials to Richard Longway, Travis Longway, Adam Longway, and Mr. Eaton. I explained the purpose of my visit and which areas of the farm I planned to inspect. Prior to touring the farm properties, my boots were disinfected in accordance with the EPA Biosecurity procedures.

Facility #1: Longway Farm – 91 Janes Road, Swanton, VT

Facility Information/Field Observations:

- Longway Farm ("the main farm") is a dairy operation with 500 milking and dry cows. There are also 120 heifers and some calves at this location.
- Crop acreage is between 900-950 acres. Manure land application is completed by farm employees. Drag lines were purchased last year to inject manure on some corn fields.
- The owners are looking at implementing clean water diversion projects using NRCS EQIP funding.
- Recent improvements include new concrete curbing installed around the heifer barnyard (photo #1). The owners plan to regrade and install a concrete pad at the heavy use area in front of the main barn with EQIP funds (photo #2); Mr. Eaton said this project will make the heavy use area cleaner/allow them to scrape up manure.
- A silage leachate collection/treatment system was installed at the main farm in 2007 using NRCS design and funding assistance.
- Animal mortalities are taken off-site to a rendering facility.
- The nearest waterway is an unnamed riverine wetland stream located north of the silage bunkers. The unnamed wetland stream is one in a series which flow north and converge to discharge in Lake Champlain, (located 0.9 miles west of the farm production area).
- In the main barn, manure is automatically scraped into hoppers and gravity-flows into the manure pit.
- The high-flow/low-flow leachate/runoff collection system for the silage area has a 2,000 gallon tank for low flows and a vegetated treatment cell for high flows. At the time of inspection, the low-flow pipe was clogged and required a clean-out (photo #3). The pump which transfers leachate from the 2,000 gallon tank to the manure pit was broken. Travis and Adam Longway explained that the pump recently stopped working, because of acidic leachate which rots out the pump and requires them to replace it about every 2

years. At the time of inspection, some low-flow runoff was entering into the high-flow area, which is a vegetated treatment cell designed by NRCS (photo #4).
- The main manure pit is clay-lined. We observed some woody vegetation on the banks of the pit which the owners had recently killed and planned to remove.

Facility #2: Brodeur Farm – 123 Comstock Road, Swanton, VT

Facility Information/Field Observations:
- Brodeur Farm ("the heifer farm") is a youngstock/heifer facility which operates independently of the main farm. There are about 200 heifers and some dry cows on site.
- The heifer farm has two waste storage structures, including an earthen 1.2 MG manure pit and an older slurry pit which is no longer used, according to Richard Longway.
- Animal mortalities are taken off-site to a rendering facility.
- The nearest water of the U.S. is an unnamed riverine wetland stream that flows by the north side of Brodeur farm. The unnamed stream flows west into a wetland system that is connected to Stevens Brook, which discharges to St. Albans Bay/Lake Champlain.
- The farm has a walkway on the north side of the farm which dry cows use to access pasture areas. The (unpaved/dirt) walkway crosses over the unnamed stream. There is potential for manure discharge from the walkway if the area is not cleaned regularly. Richard Longway said the wooded hill north of the farm slopes toward the farm, resulting in surface water run-on to the walkway and silage bunkers.
- Runoff from the silage bunkers is collected and flushed through the freestall barn, where it then enters hoppers and is sent to the on-site manure pit. The silage runoff collection system was designed by NRCS. Mr. Eaton explained that the design is flawed because in addition to silage runoff, the collection system receives surface flow from the farm road/driveway and cow walkway. Mr. Eaton said the excess water flowing to the silage area is undermining the silage bunks and causing feed spoilage.
- A pile of spoiled feed was positioned next to the intake screen to the silage runoff collection system, and there was a build-up of solids at the intake screen (photo #5).
- Mr. Eaton said the plan is to use NRCS EQIP funds to correct the silage collection design issues by shrinking the area which drains to the collection system and creating clean water diversions to protect the silage bunkers.

Records Review:
- The farm has a comprehensive nutrient management plan (CNMP) developed through Agricultural Consulting Services (ACS) of Ithaca, NY. The CNMP includes maps of proposed and existing conditions at the two farms. Mr. Eaton explained various sections included in the CNMP.
- The CNMP also discusses existing and future best management practices (BMPs) at the main farm, including access road improvements to harden surfaces, clean water diversion projects, and erosion and ponding prevention.
- The CNMP discusses the high-flow vegetated treatment area (VTA) at the main farm, noted as having "a grass/vegetation kill area with a flow path". ACS recommends removing soil and installing level-lip spreaders to create more sheet flow in the VTA.
- At Brodeur farm, the BMPs proposed in the CNMP include diverting surface runoff away from the silage bunkers and adding roof drains and gutters on the freestall barn.

V. Exit Briefing

An exit briefing was conducted with Richard Longway and Tom Eaton to discuss the following:

- At the Longway (main) Farm, the low-flow pipe on the leachate collection system needs to be cleaned out to prevent low-flow leachate from entering the high-flow vegetated treatment area. The pump for the 2,000 gallon low-flow tank needs to be repaired or replaced.
- At Brodeur Farm, the pile of spoiled feed near the intake screen to the silage runoff collection system should be relocated to keep solids from building up on the screen.
- Mr. Eaton confirmed that the silage runoff collection system at Brodeur Farm will be improved using NRCS EQIP funds.
- At Brodeur Farm, the walkway which crosses over the unnamed stream needs to be cleaned regularly to avoid a discharge of manure.

End of Report

Report Attachments**:**
Inspection photos
Aerial photo map